

Objection Deadline: August 4, 2025 at 5:00 p.m. (Eastern Time)

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

In re:

ORION HEALTHCORP, INC.,¹

Debtor.

Chapter 11

Case No. 18-71748 (AST)

HOWARD M. EHRENBERG IN HIS CAPACITY
AS LIQUIDATING TRUSTEE OF ORION
HEALTHCORP, INC., et al.,

Plaintiff,

- against -

ABRUZZI INVESTMENTS, L.L.C.; JOHN
PETROZZA,

Defendant.

Adversary Proc. No. 20-08052 (AST)

**NOTICE OF PRESENTMENT OF MOTION OF
PLAINTIFF FOR ENTRY OF ORDER FOR TURNOVER OF FUNDS**

PLEASE TAKE NOTICE, that on July 18, 2025, Howard M. Ehrenberg, the Liquidating Trustee of Orion HealthCorp., Inc. (“Plaintiff” or “Trustee”) of the bankruptcy estate of Orion HealthCorp., Inc. (the “Debtor”), filed a motion (the “Motion”), seeking entry of an order for turnover of funds of Defendants held by Bank of America in accordance with the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Orion Healthcorp, Inc. (7246); Constellation Healthcare Technologies, Inc. (0135); NEMS Acquisition, LLC (7378); Northeast Medical Solutions, LLC (2703); NEMS West Virginia, LLC (unknown); Physicians Practice Plus Holdings, LLC (6100); Physicians Practice Plus, LLC (4122); Medical Billing Services, Inc. (2971); Rand Medical Billing, Inc. (7887); RMI Physician Services Corporation (7239); Western Skies Practice Management, Inc. (1904); Integrated Physician Solutions, Inc. (0543); NYNM Acquisition, LLC (unknown) Northstar FHA, LLC (unknown); Northstar First Health, LLC (unknown); Vachette Business Services, Ltd. (4672); Phoenix Health, LLC (0856); MDRX Medical Billing, LLC (5410); VEGA Medical Professionals, LLC (1055); Allegiance Consulting Associates, LLC (7291); Allegiance Billing & Consulting, LLC (7141); New York Network Management, LLC (7168). The corporate headquarters and the mailing address for the Debtors listed above is 1715 Route 35 North, Suite 303, Middletown, NJ 07748.____.

subpoena and restraining notice issued in the above-captioned adversary proceeding (the “Adversary Proceeding”).

PLEASE TAKE FURTHER NOTICE, that on **August 8, 2025 at 12:00 p.m.** the Trustee will present a proposed order (the “Proposed Order”), a copy of which is attached hereto as Exhibit 1 in accordance with LBR 2002-1, granting the Motion to the Honorable Alan S. Trust, Chief United States Bankruptcy Judge, at the United States Bankruptcy Court for the Eastern District of New York, Alfonse M. D’Amato Federal Courthouse, 290 Federal Plaza, Central Islip, New York 11722.

PLEASE TAKE FURTHER NOTICE, that objections, to the relief sought in the Motion shall be in writing, shall conform to the requirements set forth in E.D.N.Y. LBR 9013-1, and filed with the Court electronically in accordance with General Order M-399 by registered users of the Court’s electronic case filing system and, by all other parties in interest, mailed to the Clerk the United States Bankruptcy Court, Eastern District of New York, Alfonse M. D’Amato Federal Courthouse, 290 Federal Plaza, Central Islip, New York 11722, on a CD or flash drive, preferably in Portable Document format (PDF), WordPerfect or any other Windows-based word processing format (with a hard copy delivered directly to the Chambers of Judge Alan S. Trust, United States Bankruptcy Court, Eastern District of New York, Alfonse M. D’Amato Federal Courthouse, 290 Federal Plaza, Central Islip, New York 11722, and served in accordance with General Order M-399 upon: (i) Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 34th Floor, New York, New York 10017, Attn: Ilan D. Scharf, Esq. and Jeffrey P. Nolan, Esq.; and (ii) the Office of the United States Trustee, Long Island Federal Courthouse, 560 Federal Plaza, Room 560, Central Islip, New York 11722, (Attn: William K. Harrington, Esq.), so as to be received no later than **5:00 p.m. on August 4, 2025**.

PLEASE TAKE FURTHER NOTICE, that if a timely objection is filed, the Court may schedule a hearing to consider the Motion and any objections.

Dated: July 18, 2025

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Jeffrey P. Nolan

Ilan Scharf, Esq.

Jeffrey P. Nolan, Esq.

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